

EXHIBIT 1

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11

FTX TRADING LTD., *et al.*¹ Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

Re: D.I. ____

**ORDER STRIKING PORTIONS OF THE DECLARATION OF BRIAN D.
GLUECKSTEIN IN SUPPORT OF DEBTORS' MOTION TO ENFORCE
THE AUTOMATIC STAY OR, IN THE ALTERNATIVE, EXTEND THE
AUTOMATIC STAY**

Upon the motion (“Motion”)² of BlockFi Inc. (“BlockFi Inc.”), BlockFi Lending LLC (“BlockFi Lending”), and BlockFi International LLC (“BlockFi International,” together with BlockFi Inc. and BlockFi Lending, “BlockFi”) for entry of an order (this “Order”) striking portions of the Glueckstein Declaration; and this Court, having held a hearing to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings that had before this Court; and the Court having found and determined the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore:

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not defined herein are defined in the Motion.

2. Exhibits B–M of the Glueckstein Declaration [D.I. 292] are hereby STRUCK from the record and will not be considered for any purpose.

Dated: _____, 2023
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE